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Agency Secretary  
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## Department of Toxic Substances Control

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Arnold Schwarzenegger  
Governor

April 11, 2006

Ms. Sheila Roebuck  
Lennar Mare Island  
690 Walnut Avenue, Suite 100  
Vallejo, California 94592

### LENNAR MARE ISLAND CERTIFICATION AND TERMINATION OF RESOURCE CONSERVATION AND RECOVERY ACT CORRECTIVE ACTION IN INVESTIGATION AREA D1.2

Dear Ms. Roebuck:

The Department of Toxic Substances Control (DTSC) has reviewed your request to terminate Resource Conservation and Recovery Act (RCRA) Corrective Action at Lennar Mare Island (LMI) Investigation Area D1.2 (IA D1.2), and to certify that no further remedial activities are necessary for IA D1.2. The enclosed map depicts the extent of IA D1.2. Termination of RCRA Corrective Action and certification of the western portion of IA D1 occurred in October 2004.

DTSC has been providing oversight for the LMI cleanup under a Consent Agreement, dated April 16, 2001, between DTSC, LMI and the City of Vallejo.

IA D1.2 is the eastern portion of IA D1 which is located in the central and southern areas of LMI property and is subject to the Consent Agreement. It occupies 113.64 acres of the entire 231 acres of IA D1. Past uses of this area included military housing and barracks, community service and recreational facilities, offices, garages, and storage/service buildings. According to the City of Vallejo's Preliminary Land Use Plan, residential and educational uses are intended for IA D1.2.

The following areas at IA D1.2 have been identified and evaluated with regard to environmental issues:

**Installation Restoration (IR) Site 14 Pipeline in IA D1:** LMI inspected and cleaned the pipeline to remove residual solids to comply with the requirements of the RCRA. DTSC had identified the industrial wastewater pipeline as an interim status unit under RCRA because it is an appurtenance to the Industrial Wastewater Treatment Plant. In order to satisfy RCRA requirements, the pipeline within IA D1.2 was inspected on

April 30, 2004 to determine if waste remained in place. The inspection revealed that the pipeline was intact and in good condition. No breaks were observed; however, solids were found intermittently in the pipeline. In June 2004, a composite sample of the solids was collected from three manhole locations. No volatile organic compounds or semivolatile organic compounds were detected; however, metals and polychlorinated biphenyls were detected. On July 20, 2004, the IR14 pipeline segments in IA D1.2 were flushed of residual solids and the pipeline was inspected again by video survey to confirm that all solids had been removed. No solids were observed in the final video inspection, confirming that no residual waste remains inside the pipeline. During the flushing, rinsewater and solid material were collected for disposal evaluation. The analytical result for the rinsewater met the City of Vallejo Sanitation Flood Control District criteria and was discharged to the sanitary sewer on August 23, 2004. The solid material was disposed of at appropriate landfills.

**Lead-based Paint (LBP) in Soil:** In March and April 2004, soil sampling was conducted at 108 buildings located within IA D1.2 to characterize the concentration of lead in soil from LBP. Soil samples were collected from the exposed soil areas around buildings, both along the drip line and in the mid-yard area, and analyzed for lead. DTSC approved risk-based cleanup goals for residential use of 210 mg/kg for a building site-wide average concentration in conjunction with an upper limit on each individual sample concentration of 400 mg/kg. For non-residential areas, the acceptable building site-wide average concentration was established at 750 mg/kg with all individual sample concentrations required to be below 1,000 mg/kg. In comparing the analytical results from the soil sampling to the cleanup goals at the 108 buildings in IA D1.2, 87 buildings required excavation of lead-impacted soil. CH2M HILL performed soil removal at 62 of the 87 structures in October and November 2004 and January through April 2005. ENTACT performed soil removal at the remaining 25 structures in June through August 2005. Following the soil excavation, verification sample results indicate that remaining lead concentrations in soil at the 87 buildings within IA D1.2 are below the cleanup goals based on the proposed land use. Of the 87 buildings, 77 were remediated to unrestricted land use levels and 10 were remediated to levels acceptable for non-residential use requiring Land Use Covenants (LUCs) to prohibit use as residential, schools for persons less than 18 years of age, hospitals, and day-care centers for children. The IA D1.2 Implementation Report documents the necessary remedial actions and results.

**Petroleum sites:** Thirteen underground storage tanks (UST) and 20 segments of the Fuel Oil Pipeline (FOPL) within IA D1.2 were identified, investigated and cleaned up based on the proposed land use in accordance with Regional Water Quality Control Board (RWQCB) Order R2-2002-0105. Requests for no further action for each UST and FOPL segment have been submitted by LMI and approved by the RWQCB and DTSC.

**Polychlorinated biphenyl (PCB) Sites:** Thirty four PCB sites within IA D1.2 were identified and evaluated. DTSC and the United States Environmental Protection Agency (USEPA) have approved the closure of 19 PCB sites for unrestricted use. These 19 PCB sites were remediated to or below 0.22 mg/kg in soil as established by USEPA as the residential preliminary remedial goal (PRG).

Fifteen PCB sites required remedial activities which included soil and concrete removal, encapsulation, and the recordation of land use covenants (LUCs). PCB-specific LUCs have been entered into by LMI and DTSC, and designate the USEPA as a third-party beneficiary. USEPA will also have enforcement authority with respect to the restrictions related to the PCB-specific LUCs. The LUCs prohibit future use of the property for sensitive uses with provisions for enforcement and are recorded with the County of Solano.

Encapsulation and recordation of LUCs are required for four PCB sites. Two of these sites have elevated concentrations of PCBs underneath active transformers, and two sites have floors encapsulated through application of two coats of epoxy paint in accordance with the provisions of Toxic Substances Control Act (TSCA). The remaining PCB sites requiring LUCs have PCBs in concrete, wood or asphalt surfaces. In addition to management provisions specific to the condition of the sites and the measures used to prevent exposure, the LUCs require that if the use of the property changes in a manner that increases the risk of exposure to PCBs, an evaluation of the feasibility of implementing remedial measures that at least reduce increased exposure risks from PCBs is required to be approved by DTSC and USEPA.

**LUC Operations and Maintenance Plan:** An Operations and Maintenance Plan has been instituted for lead in soil and PCB sites that require LUCs in D1.2. Based on the requirements of the LUCs, the Operations and Maintenance Plan includes provisions for implementation of the specific terms of the individual LUCs, as well as requirements for periodic reporting, enforcement of restrictions, and reimbursement of DTSC costs associated with the administration of the restrictions.

The Remedial Action Plan (RAP) for IA D1 was prepared, circulated for a 30-day public review from April 22, 2004 through May 21, 2004, and discussed at a public meeting held on April 29, 2004. DTSC approved the final IA D1 RAP on May 27, 2004. A California Environmental Quality Act Negative Declaration was concurrently prepared, circulated for 30 days, and signed on May 27, 2004. A notice to terminate RCRA Corrective Action for IA D1.2 was also circulated for a 45-day public review from October 31, 2005 through December 15, 2005. No written comments were received; however, several phone inquiries regarding the LUCs were received and answered.

Based upon our review of the completed remedial and corrective actions and the related public review process, DTSC hereby terminates RCRA Corrective Action within IA D1.2

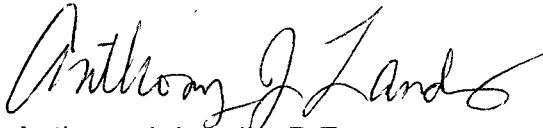
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pursuant to the California Health and Safety Code (HSC) Chapter 6.5 and certifies, pursuant to California HSC Chapter 6.8, that no further corrective action is necessary within IA D1.2.

DTSC reserves the right to address any appropriate environmental or human health related issues should additional information concerning the environmental condition of the property become available in the future. In the event of a newly discovered release, LMI must notify DTSC within 30 days and the closure certification will be reevaluated as to whether any corrective action is required. In addition, if any portion of IA D1.2 is proposed for acquisition or construction of school facilities utilizing state funding, a separate environmental review process in compliance with California Education Code 12710 et seq., is required to be conducted and approved by DTSC's Schools Division. Since the Schools Division is also a fee-for-service program, it will be necessary for the proponent to enter into an agreement for cost recovery with DTSC's Schools Division for its review under the Education Code requirements.

If you have any questions, please contact Mr. Henry Chui, DTSC's Project Manager, at (510) 540-3759.

Sincerely,

A handwritten signature in cursive script, reading "Anthony J. Landis".

Anthony J. Landis, P.E.  
Chief  
Northern California Operations  
Office of Military Facilities

Enclosure

cc: See next page.

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